

BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA
DOCKET NO. 2014-481-WS

IN RE:)	
)	
B2 HOLDINGS, L.L.C)	
PLAINTIFF,)	
)	REQUEST FOR
)	RECONSIDERATION
)	
v.)	
CAROLINA WATER SERVICE, INC.,)	
DEFENDANT.)	
_____)	

To the Defendant above-named:

YOU WILL PLEASE TAKE NOTICE that B2 Holdings moves for the Public Service Commission to reconsider its directive dated February 25, 2015 for the following reasons:

1. The Directive does not take into account all the relief that B2 Holdings is requesting. In its Amended Complaint, B2 Holdings requests that the defendant Water Company charge the Plaintiff for wastewater removal based on the amended R.61.67 currently proposed in the legislature by South Carolina DHEC. This document is part of the current tariff, and is expected to go into effect on May 15, 2015, according to the Defendant's pleadings. The amendment would reduce Plaintiff's wastewater removal bill by at least 25%.

Furthermore, the plaintiff also asks for its wastewater collection bill to be reduced or eliminated during the year one of its business tenants, a restaurant, was closed.

Plaintiff B2 Holdings also asks that the \$1140 charge for past underestimated charges be eliminated entirely. Plaintiff understands that exceptions can be made for particular customers. Plaintiff asks for an exception to be made in his case, because actual water usage falls so far below the rate he is charged for wastewater collection.

Plaintiff notes that all CWS customers are not charged consistently. Defendant chooses which customers to charge at the rate imposed by the tariff.

The Commission's directive ignores these requests

2. Because there was no service by email from the Defendant Water Company, the Plaintiff did not receive the water company's Return to Complainant/Petitioner's Motion to Amend the Complaint until Wednesday February 25, 2015 -- the day the Commission met to decide this matter. Plaintiff's attorney understood that all service would be by email, not regular U.S. Mail. Receipt of this pleading beforehand would have made a difference in Plaintiff's arguments.

For these reasons, and more that may be introduced in oral arguments, Plaintiff asks the Commission to reconsider its Directive in this case.

DATE: March 6, 2015

/s/ Laura P. Valtorta
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